

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 7
Team Systems International, LLC,	Case No. 22-10066-CTG
Debtor(s).	Re: D.I. 453, 530
George L. Miller, solely in his capacity as the Chapter 7 Trustee of Team Systems International, LLC,	Adv. Proc. No. 23-50004 (CTG)
Plaintiff,	Re: Adv. D.I. 174, 256, 268
v.	<b>Objection Deadline: 8/15/24</b>
Deborah Evans Mott, Steven M. Acosta, Christopher Mott, John S. Maciorowski, Addy Road LLC, Brent Road LLC, Benjamin P. Smith, Jessica M. Smith, TSI Gulf Coast, LLC, TSI Education & Training, Inc., and Team Systems International Southeast LLC, and John Does 1-100,	<b>Hearing Date:</b> If an objection is file, a hearing will be determined at the discretion of the Court
Defendants.	

**NOTICE OF FILING OF CREDITORS' STATEMENT OF FEES AND  
EXPENSES FOR IMMEDIATE PAYMENT BY RANDY M. MOTT, ESQ.**

PLEASE TAKE NOTICE that, on March 5, 2024, creditors, GPDEV LLC, Simons Exploration, Inc. (the “**Creditors**”) filed *Creditors’ and Their Counsels’ (i) Objection to Defendants’ Amended Rule 60(B)(3) Motion to Set Aside the Court’s January 31, 2023 Decision; (ii) Request for Permission to Submit Document Under Seal and Conduct a Partially Closed Hearing Thereon; (iii) Request for Entry of an Order to Show Cause; and (iv) Cross Motion for Sanctions* [Main Case D.I. 453; Adv. D.I. 174] (“**Creditors’ Sanctions Motion**”).

PLEASE TAKE FURTHER NOTICE that, on July 9, 2024, the United States Bankruptcy Court for the District of Delaware (the “**Court**”) entered its *Memorandum Opinion* [Adv D.I. 256] resolving the Creditors’ Sanctions Motion, among other matters.

PLEASE TAKE FURTHER NOTICE that, on July 22, 2024, the Court entered the *Order Resolving Motions for Sanctions and Motion to Strike* [Main Case D.I. 530; Adv. D.I. 268] (the

**“Sanctions Order”**).<sup>1</sup> Among other things, the Sanctions Order granted in part Creditors’ Sanctions Motion and stated, among other things, that “Randy M. Mott, Esq. is hereby directed to pay all attorneys’ fees and expenses reasonably incurred by the Creditors before, at, and following the April 29, 2024 hearing in connection with the Motions to Vacate and the Creditors’ Sanctions Motion.” Sanctions Order ¶ 5.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Sanctions Order, the Creditors hereby file and serve this *Notice of Creditors’ Statement of Fees and Expenses for Immediate Payment by Randy M. Mott, Esq.*, seeking sanctions in the **total amount of \$86,185.07** in reasonable fees and expenses incurred by Creditors as of July 30, 2024 in connection with the Motions to Vacate and the Creditors’ Sanctions Motion.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Sanctions Order, **by no later than August 15, 2024**, which is fourteen (14) days from the date of service of this Notice, Randy M. Mott, Esq. shall either (a) pay the total amount set forth in this *Notice of Creditors’ Statement of Fees and Expenses for Immediate Payment by Randy M. Mott, Esq.*, or (b)(i) file and serve an objection hereto, and (ii) post a bond with the Court in the full amount of this *Notice of Creditors’ Statement of Fees and Expenses for Immediate Payment by Randy M. Mott, Esq.*

PLEASE TAKE FURTHER NOTICE that, pursuant to the Sanctions Order, if an objection is filed, the Court will conduct a further hearing at a date and time to be determined by the Court, or otherwise will resolve the dispute.

PLEASE TAKE FURTHER NOTICE the Creditors reserve their rights to submit further statements of fees and expenses for immediate payment by Randy M. Mott, Esq. for additional fees and expenses reasonably incurred by Creditors in connection with the Motions to Vacate and the Creditors’ Sanctions Motion, including but not limited to all fees and costs incurred in connection with Randy Mott's appeal of the Sanctions Order, and all fees and costs incurred in connection with collection.

Dated: August 1, 2024

KASEN & KASEN, P.C.

/s/ Jenny R. Kasen

Jenny R. Kasen, Esquire (DE Bar No. 5849)

1213 N. King Street, Suite 2

Wilmington, DE 19801

Telephone: (302) 652-3300

Facsimile: (856) 424-7565

E-Mail: jkasen@kasenlaw.com

And

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<sup>1</sup> Capitalized terms used but not defined in this Notice have the meanings set forth in the Sanctions Order.

GRAYROBINSON, P.A.

/s/ Leonard M. Collins

Leonard M. Collins, Esq. (FBN 423210)

301 S. Bronough Street, Suite 600

Tallahassee, FL 32301

Telephone: (850) 577-9090

E-Mail: [Leonard.Collins@gray-robinson.com](mailto:Leonard.Collins@gray-robinson.com)

*Counsel to GPDEV, LLC and  
SIMONS EXPLORATION, INC.*

**CREDITORS' STATEMENT OF FEES AND EXPENSES  
FOR IMMEDIATE PAYMENT BY RANDY M. MOTT, ESQ.**

KASEN & KASEN, P.C.  
1213 N. King Street, Suite 2  
Wilmington, DE 19801

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**Invoice Date:** 07/30/24  
**Client(s):** GPDEV, LLC and Simons Exploration, Inc.  
**Matter(s):** Team Systems International, LLC - Ch. 11 No. 22-10066/CTG

**INVOICE SUMMARY:**

Fees incurred as of 7/30/24 in connection with the Motions to Vacate and Cross Motions for Sanctions	\$	45,080.00
Costs advanced as of 7/30/24 in connection with the Motions to Vacate and Cross Motions for Sanctions	\$	5,648.72
<b>TOTAL DUE AS OF 7/30/24*</b>	<b>\$</b>	<b>50,728.72</b>

\* NOTE - Additional invoices will be submitted for all future fees and costs incurred in connection with the Motion to Vacate and Cross Motions for Sanctions, including but not limited to all fees and costs incurred in connection with Randy Mott's appeal of the sanctions Order, and all fees and costs incurred in connection with collection efforts

KASEN & KASEN, P.C.  
1213 N. King Street, Suite 2  
Wilmington, DE 19801

**Invoice Date:** 07/30/24  
**Client(s):** GPDEV, LLC and Simons Exploration, Inc.  
**Matter(s):** Team Systems International, LLC - Ch. 11 No. 22-10066/CTG

**FEES INCURRED AS OF 7/30/24 IN CONNECTION WITH THE MOTIONS TO VACATE AND CROSS MOTIONS FOR SANCTIONS**

DATE	CLIENT	ATTORNEY	TIME	RATE	FEE	DESCRIPTION OF SERVICES
01/31/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Reviewed and saved motion to vacate
01/31/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	1.5	\$ 400.00	\$ 600.00	Reviewed and saved memorandum of law in support of motion to vacate
01/31/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Reviewed and saved exhibits in support of motion to vacate
01/31/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.3	\$ 400.00	\$ 120.00	Reviewed and saved Acosta declaration in support of motion to vacate
01/31/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Reviewed and saved Mott declaration in support of motion to vacate
01/31/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Reviewed and saved proposed order to vacate
02/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	.5	\$ 400.00	\$ 2,000.00	Reviewed case file and docket re motion to vacate and cross motion for sanctions
02/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Phone call(s) with Office of Disciplinary Counsel re motion to vacate and cross motion for sanctions
02/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with Office of Disciplinary Counsel re motion to vacate and cross motion for sanctions
02/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.3	\$ 400.00	\$ 120.00	Reviewed and saved amended exhibits in support of motion to vacate
02/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Reviewed and saved amended Acosta declaration in support of motion to vacate
02/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Reviewed and saved amended memorandum of law in support of motion to vacate
02/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Reviewed and saved amended motion to vacate
02/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Reviewed and saved amended Mott declaration in support of motion to vacate
02/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Reviewed and saved amended proposed order to vacate
02/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	1	\$ 400.00	\$ 400.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
02/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.3	\$ 400.00	\$ 120.00	Phone call(s) with Office of Disciplinary Counsel re motion to vacate and cross motion for sanctions
02/07/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/07/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
02/08/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/08/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	1.3	\$ 400.00	\$ 520.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
02/09/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with clients re motion to vacate and cross motion for sanctions
02/09/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/09/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Reviewed notes re motion to vacate and cross motion for sanctions
02/09/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Phone call(s) with client(s) re motion to vacate and cross motion for sanctions
02/09/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
02/10/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Reviewed notes re motion to vacate and cross motion for sanctions
02/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with clients re motion to vacate and cross motion for sanctions
02/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Filed certification of counsel and stipulation extending deadlines
02/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Prepared certification of counsel for stipulation extending deadlines
02/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Prepared letter requesting extension of time re motion to vacate and cross motion for sanctions
02/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Prepared stipulation extending deadlines
02/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
02/13/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with clients re motion to vacate and cross motion for sanctions
02/13/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with Court re motion to vacate and cross motion for sanctions
02/13/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Uploaded proposed Orders re motion to vacate and cross motion for sanctions
02/13/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Phone call(s) with Court re motion to vacate and cross motion for sanctions
02/14/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/14/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.8	\$ 400.00	\$ 320.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
02/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Reviewed and saved order staying motion to vacate pending appeal
02/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Reviewed and saved trustee letter regarding order staying motion to vacate pending appeal
02/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.4	\$ 400.00	\$ 160.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
02/16/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/16/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with Court re motion to vacate and cross motion for sanctions
02/16/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Reviewed and saved order vacating order staying motion to vacate
02/16/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	1	\$ 400.00	\$ 400.00	Reviewed and saved trustee objection to amended motion to vacate
02/16/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.3	\$ 400.00	\$ 120.00	Reviewed and saved trustee's exhibits in opposition to amended motion to vacate
02/16/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
02/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Reviewed and saved UST's reply in opposition to amended motion to vacate
02/21/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/21/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Reviewed and saved motion to extend time to reply to sanctions motion
02/23/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Reviewed and saved certification of counsel re: stipulation of briefing schedule
02/23/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.3	\$ 400.00	\$ 120.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
02/27/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Reviewed and saved Randy Mott pro hac vice motion
02/27/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Reviewed and saved reply to UST objection to motion to vacate
02/28/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/28/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Filed exhibits
02/28/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Filed objection to pro hac vice motion re motion to vacate
02/28/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Prepared objection to pro hac vice motion re motion to vacate
02/28/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Reviewed and saved Mott letter re motion to vacate
02/28/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Phone call(s) with clients re motion to vacate and cross motion for sanctions
02/28/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.8	\$ 400.00	\$ 320.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
02/29/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
02/29/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Reviewed and saved Mott filing re motion to vacate
02/29/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.3	\$ 400.00	\$ 120.00	Reviewed and saved partial withdrawal of motion to vacate
02/29/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Reviewed and saved Randy Mott pro hac vice order
02/29/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Reviewed court notice re motion to vacate
02/29/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
03/04/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with clients re motion to vacate and cross motion for sanctions
03/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Filed objection and cross motion for sanctions
03/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	1	\$ 400.00	\$ 400.00	Prepared declaration in support of cross motion for sanctions
03/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	1.5	\$ 400.00	\$ 600.00	Prepared exhibits in support of cross motion for sanctions
03/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	15	\$ 400.00	\$ 6,000.00	Prepared objection and cross motion for sanctions
03/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$ 400.00	\$ 200.00	Reviewed notes re motion to vacate and cross motion for sanctions
03/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Served cross motion for sanctions
03/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Phone call(s) with clients re motion to vacate and cross motion for sanctions
03/05/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$ 400.00	\$ 80.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
03/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$ 400.00	\$ 40.00	Filed supplemental declaration in support of cross motion for sanctions

03/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.3	\$	400.00	\$	120.00	Prepared supplemental declaration in support of cross motion for sanctions
03/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Prepared supplemental exhibits in support of cross motion for sanctions
03/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Served supplemental declaration in support of cross motion for sanctions
03/06/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$	400.00	\$	200.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
03/07/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$	400.00	\$	200.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
03/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.8	\$	400.00	\$	320.00	Reviewed and saved objection to creditors cross-motion for sanctions
03/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.8	\$	400.00	\$	320.00	Reviewed and saved objection to trustee's cross motion for sanctions
03/13/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/13/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.6	\$	400.00	\$	240.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
03/14/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.3	\$	400.00	\$	120.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
03/19/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with clients re motion to vacate and cross motion for sanctions
03/19/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/19/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/19/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Filed reply in further support of cross motion for sanctions
03/19/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	8	\$	400.00	\$	3,200.00	Prepared reply in further support of cross motion for sanctions
03/19/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$	400.00	\$	200.00	Reviewed trustee's reply in further support of cross motion for sanctions
03/19/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
03/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with clients re motion to vacate and cross motion for sanctions
03/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with court re motion to vacate and cross motion for sanctions
03/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Filed request for oral argument and evidentiary hearing
03/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Prepared request for oral argument and evidentiary hearing
03/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed and saved order re briefing schedule
03/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed and saved UST's request for oral argument
03/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	1	\$	400.00	\$	400.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
03/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Phone call(s) with Court re motion to vacate and cross motion for sanctions
03/22/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/23/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/25/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
03/25/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with court re motion to vacate and cross motion for sanctions
03/25/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed and saved trustee's request for oral argument
03/26/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed court notice regarding evidentiary hearing
04/01/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with clients re motion to vacate and cross motion for sanctions
04/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with clients re motion to vacate and cross motion for sanctions
04/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
04/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Filed notice of testimony subpoenas
04/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Prepared acosta testimony subpoena
04/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Prepared Deborah Mott testimony subpoena
04/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Prepared Munoz testimony subpoena
04/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Prepared notice of testimony subpoenas
04/02/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Prepared Randy Mott testimony subpoena

05/09/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
05/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
05/13/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
05/13/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Filed certification of counsel and stipulation extending briefing deadlines for sanctions motions
05/13/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Prepared certification of counsel and stipulation extending briefing deadlines for sanctions motions
05/13/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
05/14/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
05/14/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed and saved order extending briefing deadlines for sanctions motions
05/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with clients re motion to vacate and cross motion for sanctions
05/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
05/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Filed post hearing brief
05/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	8	\$	400.00	\$	3,200.00	Prepared post hearing brief
05/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.8	\$	400.00	\$	320.00	Reviewed and saved defendants post hearing brief
05/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$	400.00	\$	200.00	Reviewed and saved Munoz post hearing brief
05/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$	400.00	\$	200.00	Reviewed and saved Rosner post hearing brief
05/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.6	\$	400.00	\$	240.00	Reviewed and saved Trustee post hearing brief
05/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.5	\$	400.00	\$	200.00	Reviewed notes from counsel
05/15/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
05/16/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
05/16/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Reviewed and saved trustee's motion to strike defendants post hearing brief and new exhibits
05/17/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
05/17/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
05/20/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
05/22/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with clients re motion to vacate and cross motion for sanctions
05/22/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with court re motion to vacate and cross motion for sanctions
05/28/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
05/28/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed and saved defendants corrected signature page to post hearing brief
05/28/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.3	\$	400.00	\$	120.00	Reviewed and saved defendants opposition to trustee motion to strike post hearing brief and new exhibits
06/10/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed and saved trustee notice of completion of briefing
06/12/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
06/17/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
07/09/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
07/09/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.8	\$	400.00	\$	320.00	Reviewed and saved opinion for sanctions
07/10/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Phone call(s) with Office of Disciplinary Counsel re motion to vacate and cross motion for sanctions
07/17/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
07/18/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
07/18/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.2	\$	400.00	\$	80.00	Reviewed draft proposed order for sanctions
07/19/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
07/22/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
07/22/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed and saved defendants corrected signature page to post hearing brief
07/22/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed and saved clerk's notice of appeal
07/22/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed and saved Order for sanctions
07/22/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Reviewed and saved transmittal of record on appeal
07/23/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
07/23/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.3	\$	400.00	\$	120.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
07/29/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Email(s) with counsel re motion to vacate and cross motion for sanctions
07/30/24	GPDEV, LLC and Simons Exploration, Inc.	JRK	0.1	\$	400.00	\$	40.00	Phone call(s) with counsel re motion to vacate and cross motion for sanctions
<b>TOTALS:</b>			<b>111</b>	<b>\$</b>	<b>45,080.00</b>			



KASEN & KASEN, P.C.  
 1213 N. King Street, Suite 2  
 Wilmington, DE 19801

**Invoice Date:** 07/30/24  
**Client(s):** GPDEV, LLC and Simons Exploration, Inc.  
**Matter(s):** Team Systems International, LLC - Ch. 11 No. 22-10066/CTG

**COSTS ADVANCED AS OF 7/30/24 IN CONNECTION WITH THE MOTIONS TO VACATE AND CROSS MOTIONS FOR SANCTIONS**

<b>Date</b>	<b>Client</b>	<b>Expense</b>	<b>Amount</b>
January-24	GPDEV, LLC and Simons Exploration, Inc.	Pacer	\$ 47.20
February-24	GPDEV, LLC and Simons Exploration, Inc.	Pacer	\$ 153.80
February-24	GPDEV, LLC and Simons Exploration, Inc.	Conference Call	\$ 13.20
March-24	GPDEV, LLC and Simons Exploration, Inc.	Lexis Nexis	\$ 86.77
March-24	GPDEV, LLC and Simons Exploration, Inc.	Pacer	\$ 50.50
April-24	GPDEV, LLC and Simons Exploration, Inc.	Lexis Nexis	\$ 12.81
April-24	GPDEV, LLC and Simons Exploration, Inc.	Pacer	\$ 61.30
April-24	GPDEV, LLC and Simons Exploration, Inc.	Conference Call	\$ 17.68
April-24	GPDEV, LLC and Simons Exploration, Inc.	Tolls and Parking	\$ 15.00
May-24	GPDEV, LLC and Simons Exploration, Inc.	Lexis Nexis	\$ 60.06
May-24	GPDEV, LLC and Simons Exploration, Inc.	Pacer	\$ 10.40
May-24	GPDEV, LLC and Simons Exploration, Inc.	Parcels - Hearing Binders	\$ 5,105.70
July-24	GPDEV, LLC and Simons Exploration, Inc.	Pacer	\$ 14.30
<b>TOTAL:</b>			<b>\$ 5,648.72</b>

Client: 181034	GPDEV, LLC and Simons Exploration, Inc.	Bill Tkpr: 1817	Collins, Leonard	Client Last Payment: 6/13/2024
Matter: 2	DEV/Simons v. TSI	Resp Tkpr: 1817	Collins, Leonard	Matter Last Billed: 6/13/2024

## Detailed Time Section (Matter)

Tkpr	Date	Hours	Amount	Rate	Description of Services Rendered	
1817	1/31/2024	1.20	474.00	395.00	B	Receipt and review of filing in bankruptcy concerning Florida litigation; prepare email to clients; prepare email to trustee. 13138989
1817	2/1/2024	2.20	869.00	395.00	B	Receipt and review of email concerning Chipman Brown Cicero & Cole LLP Retention Application (.1); exchange emails with clients; telephone conference with clients on TSI members Rule 60(b)(3) Motion to Set Aside the January 31, 2023 Decision of the Court (.3); conduct legal research concerning options to address false claims in Federal Court (1.8). 13187795
1817	2/2/2024	2.10	829.50	395.00	B	Exchange emails with David Carickhoff (.3); telephone conference with co-counsel concerning false claims and bar complaints asserted by TSI defendants (.2); review and analysis of emails and documents sent during the Chapter 11 bankruptcy to respond to claims of document falsification (1.3); telephone conference with Mr. Orner (.3). 13187811
1817	2/6/2024	2.10	829.50	395.00	B	Review and analysis of new TSI filing asserting false claims against counsel (.5); telephone conference with co-counsel (1.2); telephone conference with Mr. Orner (.4). 13187845
1817	2/9/2024	1.10	434.50	395.00	B	Review and analysis of additional documentation submitted in opposition to claims asserted by Mr. Mott (.6); telephone conference with co counsel (.5). 13187878
1817	2/10/2024	3.10	1,224.50	395.00	B	Conduct legal research and prepare lengthy analysis concerning sanctions against Mr. Mott and opposing counsel Rosner and Munoz and their respective law firms. 13187881
1817	2/12/2024	0.80	316.00	395.00	B	Exchange emails with Ms. Kasen (.3); exchange emails with Mr. Mott (.3); telephone conference with Ms. Kasen (.2). 13191334
1817	2/16/2024	0.20	79.00	395.00	B	Review and analysis of trustee's response to TSI members motion to vacate; prepare email to clients. 13192172
1817	2/20/2024	0.20	79.00	395.00	B	Review of US Trustee's filing on FRCP 60b3 motion; email clients. 13192335
8543	4/25/2024	1.40	420.00	300.00	B	Reviewed Agenda of Matters and collected hearing materials for Len Collins. 13296215
1817	5/2/2024	2.60	1,027.00	395.00	B	Prepare elements of response letter to the court concerning misconduct in the Florida litigation and during the early stages of the bankruptcy case. 13352475
1817	5/9/2024	1.20	474.00	395.00	B	Continue to prepare letter to court relative to issues that arose at hearing on sanctions. 13353062
8543	5/9/2024	0.60	180.00	300.00	B	Reviewed court docket and collected motions regarding conversion; responded to correspondence from Ryan Orner regarding same. 13353254
1817	5/14/2024	2.60	1,027.00	395.00	B	Finalize changes to brief per discussion with Ms. Kasen (2.5); telephone conference with Ms. Kasen relative to letter to the court post hearing on the motion for sanctions against counsel for creditors (.1). 13353297
1817	5/15/2024	1.80	711.00	395.00	B	Review final draft of letter to the court; review of filing by trustee; review of filing by Mr. Munoz; Review of filing by debtors counsel; prepare email to trustee; prepare email to clients; prepare email to Mr. Orner. 13353398
8543	5/17/2024	1.10	330.00	300.00	B	Received and collected post-hearing briefs and provided to clients. 13353446
Time Total		24.30	\$9,304.00			

## Detailed Disbursements Section (Matter)

Tkpr	Date	Code	Amount	Disbursement Description
1817	4/29/2024	HOTEL	311.30	B VENDOR: Leonard Collins INVOICE#: 6709596606031725 DATE: 6/3/2024 Travel Expense / Hotel Lodging - Hearing in Delaware
1817	4/29/2024	CAR	131.14	B VENDOR: Leonard Collins INVOICE#: 6709596606031725 DATE: 6/3/2024 Travel Expense / Rental Car - Hearing in Delaware
1817	4/29/2024	PARK	24.00	B VENDOR: Leonard Collins INVOICE#: 6709596606031725 DATE: 6/3/2024 Travel Expense / Airport Parking - Hearing in Delaware

Client: 181034	GPDEV, LLC and Simons Exploration, Inc.	Bill Tkpr: 1817	Collins, Leonard	Client Last Payment: 6/13/2024
Matter: 2	DEV/Simons v. TSI	Resp Tkpr: 1817	Collins, Leonard	Matter Last Billed: 6/13/2024

## Detailed Disbursements Section (Matter)

Tkpr	Date	Code	Amount	Disbursement Description
1817	4/29/2024	AIRFAR	956.00	B VENDOR: Leonard Collins INVOICE#: 6709596606031725 DATE: 6/3/2024 Travel Expense / Flight - Hearing in Delaware, 04/28/2024-04/29/2024

Disbursements Total	\$1,422.44
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## Working Timekeeper Summary Section (Matter)

Timekeeper	Hours	Amount	Rate
1817 Collins, Leonard	21.20	8,374.00	395.00
SHAREHOLDER Total	21.20	\$8,374.00	395.00
8543 Reichel, Vanessa	3.10	930.00	300.00
PARALEGAL Total	3.10	\$930.00	300.00
Working Timekeeper Matter Summary Total	24.30	\$9,304.00	395.00

## Disbursement Code Summary Section (Matter)

Code	Description	Amount
AIRFAR	Airfare	956.00
CAR	Car Rental / Taxi	131.14
HOTEL	Hotel / Lodging	311.30
PARK	Parking	24.00
Disbursement Code Summary Total		\$1,422.44

Matter:	GPDEV/Simons v. TSI	Fees	9,304.00
		Disb	1,422.44
		Total	\$10,726.44

Date Range (Time): 1/31/2024 to End of Time (Disb): 1/31/2024 to End of Time

Client: 181034	GPDEV, LLC and Simons Exploration, Inc.	Bill Tkpr: 1817	Collins, Leonard	Client Last Payment: 6/13/2024
Matter: 2	Collection of Judgment	Resp Tkpr: 1817	Collins, Leonard	Matter Last Billed: 5/8/2024

## Detailed Time Section (Matter)

Tkpr	Date	Hours	Amount	Rate	Description of Services Rendered	
1817	3/5/2024	3.70	1,461.50	395.00	B Exchange emails with co-counsel re sanctions motion (.3); exchange emails with clients re sanctions motion (.3); prepare amendments to filings (.8); conduct legal research re sanctions for false statements to courts (1.8); review of filings by the trustee (.4); telephone conference with co counsel (.1).	13238351
1817	3/11/2024	3.30	1,303.50	395.00	B Prepare revisions to filings in response to debtors response.	13239386
1817	3/13/2024	0.50	197.50	395.00	B Telephone conference with co-counsel relative to upcoming filings and claims asserted by debtors and discussing upcoming hearing and need for in person attendance.	13239466
1817	4/2/2024	1.30	513.50	395.00	B Prepare for upcoming evidentiary hearing (.8); exchange emails with Ms. Kasen regarding elements on sanctions motion (.5).	13294844
1817	4/3/2024	0.80	316.00	395.00	B Receipt and review of email from Mr. Mott (.3); attorney conference with Ms. Kasen (.5).	13295127
1817	4/18/2024	0.30	118.50	395.00	B Review of letter to Mr. Rosner; telephone conference with co-counsel.	13296985
1817	4/22/2024	1.30	513.50	395.00	B Prepare for upcoming hearing; attorney conference.	13297160
1817	4/24/2024	1.30	513.50	395.00	B Review of Motion to Strike; email clients; telephone conference with co-counsel.	13297304
1817	4/25/2024	0.80	316.00	395.00	B Attend status conference with the court in advance of hearing.	13297232
1817	4/25/2024	0.70	276.50	395.00	B Receipt and review of exhibits to be used at hearing by TSI debtors.	13297357
1817	4/26/2024	3.40	1,343.00	395.00	B Telephone conference with Ms. Kasen (.6); prepare for upcoming hearing (2.8).	13297401
1817	4/27/2024	9.50	3,752.50	395.00	B Prepare for upcoming sanctions hearing (.5); prepare closing statement (2.1); review evidence list of TSI (.5); prepare objections to evidence (2.4); review of prior hearing transcripts (1.8); prepare outlines for cross examination (2.2).	13285568
1817	4/28/2024	9.30	3,673.50	395.00	B Prepare for upcoming hearing; review of case law in support of motion for sanctions; prepare objections to evidence of TSI members; prepare closing argument; travel from Tallahassee, FL to Philadelphia, PA, travel to Wilmington DE.	13287570
1817	4/29/2024	15.60	6,162.00	395.00	B Attend hearing on TSI members 60b motion; and Creditors and trustee motion for sanctions; travel from Wilmington DE to Philadelphia, PA to Tallahassee, FL.	13287585
1817	7/23/2024	1.00	395.00	395.00	W Lengthy video conference with Ms. Kasen and Mr Hall relative to order on attorneys fees and discussing process forward.	13436637
Time Total		76.10	\$29,758.91			

## Detailed Disbursements Section (Matter)

Tkpr	Date	Code	Amount	Disbursement Description
1817	7/31/2024	EXPERT	4,275.00	W RJOmer & Company, LLC - Expert Witness GPDEV- Simons
Disbursements Total			\$5,697.44	

## Working Timekeeper Summary Section (Matter)

Timekeeper		Hours	Amount	Rate
1817	Collins, Leonard	50.20	19,829.00	395.00
SHAREHOLDER Total		50.20	\$19,829.00	395.00
Working Timekeeper Matter Summary Total		76.10	\$29,758.91	395.00

## Disbursement Code Summary Section (Matter)

Code	Description	Amount
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Date Range (Time): 1/31/2024 to End of Time (Disb): 1/31/2024 to End of Time

Client: 181034	GPDEV, LLC and Simons Exploration, Inc.	Bill Tkpr: 1817	Collins, Leonard	Client Last Payment: 6/13/2024
Matter: 2	Collection of Judgment	Resp Tkpr: 1817	Collins, Leonard	Matter Last Billed: 5/8/2024

Disbursement Code Summary Section (Matter)

Code	Description	Amount
EXPERT	Expert Witness	4,275.00
Disbursement Code Summary Total		\$5,697.44

Matter:	Collection of Judgment	Fees	29,758.91
		Disb	5,697.44
		Total	\$35,456.35

Start Time: 12:28 PM

End Time: 12:28 PM